

## R E M A R K S

Claims 1-35 are pending and under consideration. In the non-final Office Action of January 24, 2006, the Examiner made the following disposition:

- A.) Commented on Applicants' claim for foreign priority.
- B.) Objected to claims 24-33.
- C.) Rejected claims 1-14 and 20-35 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Coulouris, et al. (Coulouris, Distributed Systems Concepts and Design, 2d. ed., Addison-Wesley, 1994)*("Coulouris") in view of *Fidge (Fidge, "Logical Time in Distributed Computing Systems," Computer, Vol. 24, Issue 8, pp. 28-33, ISSN 0018-9162, August 1991)*("Fidge").
- D.) Rejected claims 15-19 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Coulouris* in view of *Fidge* and further in view of *Liedtke (Liedtke, "Improving IPC by Kernal Design," ACM Symposium on Operating System Principles, Proceedings of the Fourteenth ACM Symposium on Operating Systems Principles, ACM Press, pp. 175-188, 1994)*("Liedtke").

Applicants respectfully traverse the rejections and address the Examiner's disposition below.

- A.) Regarding Examiner's comments on Applicants' claim for foreign priority:

Applicants will submit a certified copy of the foreign priority application in a separate communication.

- B.) Objection to claims 24-33:

Claims 24-33 each have been amended as per the Examiner's request to overcome the objection.

Applicants respectfully submit the objection has been overcome and request that it be withdrawn.

- C.) Rejection of claims 1-14 and 20-35 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Coulouris* in view of *Fidge*:

Applicants respectfully disagree with the rejection.

Independent claims 1, 12, 22, 23, 34, and 35 each claim subject matter relating to service calls that are generated by a plurality of threads at a server and received at a client. A synchronization call indicates that one of the threads executed at the server has changed and indicates a number of service calls generated by the threads at the server prior to the thread change. The synchronization call is transmitted to the client to allow the client to synchronize a service call execution.

In an illustrative example, if one of the threads executing at the server has changed, the server sends a synchronization message to the client. The synchronization message indicates that 20 service calls have been generated by the server threads prior to the change. The client may synchronize service call execution by knowing that 20 service calls have been generated. If 10 service calls have been executed at the client prior to receiving the synchronization call, then the client may place at least one of the service calls into a wait position to synchronize.

This is clearly unlike *Coulouris* in view of *Fidge*, which fails to disclose or suggest Applicants' claimed synchronization call. *Coulouris* describes that multiple processes ( $p_i$ ) can pass messages to each other. *Coulouris* 326. Each message carries a time stamp  $VT_i$ . As described in *Coulouris*,

The value  $VT_i[k]$  represents a count of events (for example, updates to replicas) that have occurred at  $p_k$  and that are known at  $p_i$ , either because they originate there or because their existence is known about through message passing.

*Id.*

The Examiner argues that this description from *Coulouris* discloses or suggests a synchronization call that indicates that one of the threads executed at the server has changed and indicates a number of service calls generated by the threads at the server prior to the thread change. *Office Action of 1/24/06*, page 3. Applicants respectfully disagree. This passage from *Coulouris* fails to discuss a synchronization message that identifies whether a thread has changed and a number of service calls generated by the threads at the server prior to the thread change. Instead, *Coulouris* merely teaches that every message includes a count of events that have occurred at a single process  $p_k$  that are known to another process  $p_i$ . Thus, *Coulouris*'s message clearly fails to identify whether a thread has changed, and fails to identify the number of calls generated by a plurality of threads prior to the thread change.

*Fidge* also fails to disclose or suggest Applicants' claimed synchronization call. The Examiner argues that *Fidge* at page 30, Rules B and F, discloses or suggest Applicants' claimed synchronization call. Applicants respectfully disagree. These passages from *Fidge* fail to describe a synchronization call that identifies whether a thread has changed, and that identifies the number of calls generated by a plurality of threads prior to the thread change. Nowhere do these passages from *Fidge* mention keeping track of a number of calls, let alone a number of calls generated by a plurality of threads prior to a thread change.

Thus, *Coulouris* in view of *Fidge* still fails to disclose or suggest Applicants' claims 1, 12, 22, 23, 34, and 35.

Claims 2-11, 13-21, and 24-33 depend directly or indirectly from claims 1, 12, or 23 and are therefore allowable for at least the same reasons that claims 1, 12, and 23 are allowable.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

D.) Rejected claims 15-19 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Coulouris* in view of *Fidge* and further in view of *Liedtke*:

Applicants respectfully disagree with the rejection.

Independent claim 12 is allowable over *Coulouris* in view of *Fidge* as discussed above. *Liedtke* still fails to disclose or suggest Applicants' claimed synchronization call. Therefore, *Coulouris* in view of *Fidge* and further in view of *Liedtke* still fails to disclose or suggest claim 12.

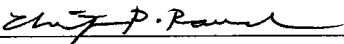
Claims 15-19 depend directly or indirectly from claim 12 and are therefore allowable for at least the same reasons that claim 12 is allowable.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

CONCLUSION

In view of the foregoing, it is submitted that claims 1-35 are patentable. It is therefore submitted that the application is in condition for allowance. Notice to that effect is respectfully requested.

Respectfully submitted,

 (Reg. No. 45,034)  
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